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Attorneys for Plaintiff and Counterclaim Defendant
CITY AND COUNTY OF SAN FRANCISCO

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

CITY AND COUNTY OF SAN FRANCISCO,

Plaintiff,

v.

CITY OF OAKLAND AND PORT OF
OAKLAND,

Defendants.

AND RELATED COUNTERCLAIM

Case No. 3:24-CV-02311-TSH

**SECOND DECLARATION OF CHRIS BIRCH
IN SUPPORT OF THE CITY'S MOTION FOR
PRELIMINARY INJUNCTION**

1 I, Christopher Birch, declare as follows:

2 1. I am the Director, Guest Experience at San Francisco International
3 Airport ("SFO"). I submit this declaration in connection with the City and County of
4 San Francisco's Reply Brief In Support Of Plaintiff City And County Of San
5 Francisco's Motion For Preliminary Injunction Enjoining Defendants. I declare that
6 the following is true to the best of my knowledge, information, and belief, and that if
7 called upon to testify, I could and would testify to the following.

8 2. As discussed in my prior declaration, SFO has begun keeping a log of
9 individuals who have mistakenly shown up at SFO intending to depart from Oakland.

10 3. In the weeks since the City filed its motion for preliminary injunction,
11 this has continued to occur, and 3 additional incidents have been logged. Attached
12 hereto as **Exhibit A** is a true and correct copy of the updated daily operation log that
13 we have been maintaining of these incidents.

14
15 I declare under penalty of perjury under the laws of the United States of
16 America that the foregoing is true and correct.

17
18 Executed on this 21st day of October 2024 at San Francisco, California.

19
20 
21 _____
22 Christopher Birch